



May 22, 2006

Docket Clerk
Fruit and Vegetable Programs
Agricultural Marketing Service
United States Department of Agriculture
Stop 02453
1400 Independence Avenue, SW
Washington, DC 20250-0243

Re: Docket FV06-1290-1PR Federal Register April 20, 2006 (Volume 71, Number 76)
Pages 20353-20357

These comments are submitted on behalf of the Wisconsin State Cranberry Growers Association (WSCGA). The WSCGA was formed in 1887 to represent the interests of Wisconsin's cranberry growers. Cranberries are the state's largest fruit crop and Wisconsin leads the nation in cranberry production producing 58% of the nation's crop in 2005.

We appreciate the opportunity to comment on the proposed rules for administration of the Specialty Crop Block Grant Program at the USDA. We were able to work with our state Department of Agriculture, Trade and Consumer Protection and other specialty crop producers in 2001 on a very successful program for use of the initial block grant program. We hope that the new program will provide state's with the flexibility to distribute block grants according to the needs of the specialty producers in each state.

We support the restriction on funds to be used for supplement of state programs rather than replacing state funds. We also support the designation of a lead agency as the state department of agriculture.

We are concerned about timeliness of dealing with the applications and what each state needs to provide for a completed application. Will a completed application allow the state to describe how funds will be distributed or will each project to be funded by the state be subject to USDA approval? If each individual project is to be subject to USDA approval as part of the application process we believe that the agency will need to be prepared to act quickly in their review.

We are also opposed to placing a priority on fresh specialty crop projects. More than 90% of the cranberry crop is sold as a processed product. By placing a priority on fresh crop projects the program will exclude a large portion of the cranberry crop and other crops such as ours. We see no justification for placing a priority on fresh or processed and would ask that the language in Sec. 1290.4(b) be deleted.

Thank you for considering our views.

Sincerely,

Tom Lochner
Executive Director